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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNDRA STEPHENS, Individually,

Plaintiff,

v.

JOHN ROBERT SKINNER, Individually;
DOE RENTER, an Individual; EAN
HOLDINGS, LLC, a Foreign-Limited
Liability Company; ENTERPRISE
LEASING COMPANY – WEST, LLC, a
Foreign Limited Liability Company;
UNITED STATES OF AMERICA;
DEPARTMENT OF THE AIR FORCE;
NELLIS AIR FORCE BASE; DOES I-XX;
Inclusive; and ROE CORPORATIONS I-XX,
Inclusive;

Defendants.

Case No. 2:24-cv-01700-RFB-DJA

**Order to Extend Time to
File a Response
(Fourth Request)**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff and Federal Defendant United States of America, for itself and on behalf of the Department of the Air Force, Nellis Air Force Base, and John Robert Skinner, a defendant herein who was acting within the course and scope of federal employment or office at the time of the subject incident ("Federal Defendants"), through undersigned counsel, hereby stipulate and agree as follows:

Plaintiff filed his state court complaint in the Eighth Judicial District Court of Nevada on June 18, 2024. ECF No. 3, p. 2, ¶ 5.

Plaintiff served Federal Defendants with a copy of the state court summons and complaint on August 23, 2024. ECF No. 3, pp. 1-2, ¶¶ 1-2.

1 Federal Defendants removed the state court case on September 12, 2024. ECF No. 1.

2 On September 30, 2024, counsel for Plaintiff and Federal Defendants agreed to a 90-
 3 day extension of time from September 30, 2024, for Federal Defendants to retrieve the
 4 information needed to review and to respond to the allegations in Plaintiff's complaint. Since
 5 the time the last stipulation was filed and approved by the Court, the parties are trying to
 6 determine the best course of action in this case since no SF 95 was submitted prior to plaintiff
 7 filing his compliant and there was no exhaustion of administrative remedies. Federal
 8 Defendants have discussed with Plaintiff the applicable statutes when proceeding in an
 9 FTCA matter. Based on these discussions, Plaintiff and Federal Defendants agreed to an
 10 additional 45-day extension of time from March 17, 2025, to May 1, 2025, to determine what
 11 are the Plaintiff's options regarding an SF 95 and exhaustion of administrative remedies. On
 12 March 14, 2025, counsel for the Plaintiff and Federal Defendants discussed these procedural
 13 issues with the lack of submission of SF 95 Form by the Plaintiff to the Agency regarding
 14 Plaintiff's claims pursuant to 28 U.S.C. § 2675 and agreed to an additional 45-day extension
 15 of time from **March 17, 2025, to May 1, 2025**, for Federal Defendants to file a responsive
 16 pleading to Plaintiff's complaint. This is the fourth request for an extension of time.

17 This stipulated request is filed in good faith and not for the purposes of undue delay.

18 Respectfully submitted this 17th day of March 2025.

19 DENTON CHO

SUE FAHAMI

Acting United States Attorney

20 /s/ Marianne Y. Denton

/s/ Virginia T. Tomova

21 MARIANNE Y. DENTON, ESQ.

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22 Nevada Bar No. 12360

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Attorneys for the Federal Defendants

Attorneys for Plaintiff

24
 25 **IT IS SO ORDERED:**

26 
 27 DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

28 DATED: March 18, 2025